

## UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

William A White

Case Number: 16-cv-948

(Clerk's Office will provide)

Plaintiff/Petitioner(s)

v.

Department of Justice

Federal Bureau of Investi-  
gation

US Marshals Service

Bureau of Prisons

Bureau of Alcohol, Tobacco,  
Firearms, and, Explosives☐ CIVIL RIGHTS COMPLAINT

pursuant to 42 U.S.C. §1983 (State Prisoner)

☐ CIVIL RIGHTS COMPLAINT

pursuant to 28 U.S.C. §1331 (Federal Prisoner)

☒ CIVIL COMPLAINT

pursuant to the Federal Tort Claims Act,

28 U.S.C. §§1346, 2671-2680, or other law

5 USC 552 Freedom of Inform-  
ation Act

## I. JURISDICTION

## AMENDED COMPLAINT

Plaintiff:

A. Plaintiff's mailing address, register number, and present place of  
confinement.William A White #13888-084  
USP - Marion  
PO Box 1000  
Marion, IL 62959

Defendant #1:

B. Defendant Department of Justice is employed as  
(a) (Name of First Defendant)Department of the United States government

(b) (Position/Title)

with 750 Missouri Ave Rm 104, E St. Louis, IL 62201

(c) (Employer's Name and Address)

At the time the claim(s) alleged this complaint arose, was Defendant #1  
employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain:

The Department of Justice is a cabinet-level depart-  
ment of the United States.

Defendant #2:

C. Defendant Federal Bureau of Investigation is employed as

(Name of Second Defendant)

Agency Of The Department of Justice

(Position/Title)

with 750 Missouri Ave Rm 104, E St Louis, IL 62201

(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain:

The Federal Bureau of Investigation is an agency of the Department of Justice.

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).  
Bureau of Alcohol, Tobacco, Firearms, and, Explosives

United States Marshals Service

Federal Bureau of Prisons

\* both are agencies of the Department of Justice, and, may be served via the US Attorneys Office at the above address.

## II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☒ Yes ☐ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:

Plaintiff(s):

I have attached a litigation summary.  
Current as of date of initial filing.

Defendant(s):

2. Court (if federal court, name of the district; if state court, name of the county):

3. Docket number:

4. Name of Judge to whom case was assigned:

5. Type of case (for example: Was it a habeas corpus or civil rights action?):

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

7. Approximate date of filing lawsuit:

8. Approximate date of disposition:

LITIGATION HISTORY  
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- c. 1997: I sued four Montgomery County, Maryland, police officers for civil rights violations in the District of Maryland. I received a small fine for procedural violations, but, lost the case.
- c. 2005: My counsel, Jack Kennett, on my behalf, sued three Housing and Urban Development employees in the Western District of Virginia under Bivens. The Court eventually ordered it refiled as an FTCA claim; Jack was appealing this when he died; I let the matter drop.
- c. 2005: Jack Kennett sued Bank of America, Citibank, and, Chase Bank, on my behalf; a favorable settlement was reached. This was also Western District of Virginia.
- Dec 2007: I was sued as a third party respondent in United States v Henry ED Va Case No 07-cv-342. A subpoena issued against me was effectively quashed.
- Feb 2008: I was charged with contempt in In Re: White (United States v Henry) 2013 US Dist LEXIS 133148 (ED Va 2013). Charges were dismissed.
- c. Jun 2008: I was charged with contempt in the Western District of Virginia in a proceeding related to United States v Henry; charges were dropped.

Oct 17 2008: I was charged in United States v White ND Ill 08-cr-054 with soliciting a felony against a federal juror.

- \* charges were dismissed United States v White 638 F Supp 2d 935 (ND Ill 2009)
- \* charges were reinstated United States v White 610 F 2d 956 (7th Cir 2010)
- \* I was convicted at trial Jan 5, 2011
- \* charges were dismissed United States v White 779 F Supp 2d 778 (ND Ill 2011)
- \* charges were reinstated United States v White 698 F 2d 1005 (7th Cir 2012)
- \* I was sentenced to 42 months imprisonment February 20, 2013
- \* cert was denied White v United States 133 S Ct 1740, 185 L Ed 802 (2013)
- \* habeas was filed December 2013 ND Ill Case No 13-cv-9042
  - \* habeas was denied May 5, 2016
  - \* certified non-frivolous appeal of denial of certificate of appealability pends 7th Cir App No 16-2108
- \* motion to recall the mandate filed Jul 1 2016
  - \* denied Jul 14 2016
  - \* certiorari pends (no case no yet assigned)

Dec 11 2008: I was charged with one count of extortion, one count of witness intimidation, and, five counts of

threats in WD VA 08-cr-054.

- \* I was acquitted at trial of extortion, and, two threat counts; I was convicted of the lesser charge of witness tampering, and, three threat charges.
- \* Another threat count was dismissed April 10, 2010 United States v White 2010 US Dist LEXIS 35999 (WD VA 2010)
- \* I was sentenced to 30 months imprisonment April 10 2010
- \* remand for resentencing March 31, 2012 [United States v White 458 Fed Appx 228 (4th Cir 2011)]
  - \* I filed the United States May 4, 2012
- \* I was arrested in Playa del Carmen, Mexico June 8, 2012
- \* I was sentenced to 10 months imprisonment for supervised release violations September 2012
- \* I was resentenced to 33 months imprisonment October 2012
- \* habeas was filed February 2013
  - \* habeas was denied April 2013 White v United States 2013 US Dist LEXIS 52063 (WD VA 2013)
  - \* upheld on appeal White v United States 536 Fed Appx 339 (4th Cir 2013)
- \* coram nobis was denied March 2015 United States v White 2015 US Dist LEXIS 35314 (WD Va 2015)
  - \* upheld on appeal United States v White 608 F Appx 160 (4th Cir 2015)
  - \* cert denied White v United States 136 S Ct 343 193 L Ed 2d 252 (2015)

- \* second or successive habeas denied Jan 2016  
4th Cir App No 15-423
- \* 2241 review granted, and, pending, ND Ill  
16-cv-2514 White v Baird
- \* The United States does not contest actual  
innocence of the underlying charges
- \* Recently transferred to SD Ill

Sep-Nov 2010: I sued a halfway house, fees prepaid, in White v Secor, Inc 2010 US Dist LEXIS 117805 (WD VA 2010)  
This was dismissed as frivolous. It is my only  
strike.

Feb 2013: I was charged with four counts of extortion in  
United States v White WD Va 13-cr-013

- \* convicted of three counts of extortion, one of  
the lesser included offense of threats, Nov 2  
2013
- \* sentenced to 92 months imprisonment May 1 2014
- \* direct appeal denied Jan 2016 United States v  
White 810 F 3d 212 (4th Cir 2016)
- \* cert denied May 5, 2016 White v United States  
194 L Ed 2d 837 (2016)
- \* new trial denied June 27, 2016. United States  
v White 2016 US3 Dist LEXIS 82986 (WD Va 2016)  
\* reconsideration pending
- \* habeas filed May 2016 WD Va 16-cv-80943
- \* pending; I maintain actual innocence

Nov 2013: I was charged with five counts of extortion, and,  
one count of identity theft in MD FL 13-cr-304

- \* convicted all counts September 13, 2014
- \* identity theft charge dismissed November 2014
- \* sentenced to 210 months imprisonment Nov 2014
- \* direct appeal, 11th Cir App No 14-15255-BB,  
denied July 2016. United States v White 2016 US  
App 12076 (11th Cir 2016)
- \* cert will be filed Sep 2016
- \* I maintain my actual innocence in this matter

Jun 2014: I filed White v Berger, Sr MD FL 14-cv-936, alleging 42 USC §1983, et sea against Seminole County, Florida, Sheriffs, acting at the direction of two US Marshals, also naming Seminole County, Florida, as a defendant.

- \* dismissed as moot Jan 2015
- \* reinstated on appeal Mar 2015
- \* claims dismissed for failure to state a claim  
reinstated July 2015; claim PLRA certified
- \* summary judgment for defendants Apr 2016:
  - \* no personal liability for US Marshals;
  - \* no respondent superior liability for Seminole County;
  - \* though the sheriffs do not deny torturing me, failure to exhaust administrative remedy regarding them (which is a lie).
- \* direct appeal pending 11th Cir 16-11606



This is a case brought under the Freedom of Information, and, Privacy, Acts 5 USC §552 et seq, for disclosure of public records currently in the possession of the FBI, the BATF, the US Marshals' Service, and, the Bureau of Prisons. These records relate either to my self, or, to an unlawful Joint Terrorism Task Force operation, described in Exh F(a), that targeted the First Amendment protected activities of "law abiding Americans."

I seek this information as a member of the media. I expect that information resulting in this request will be published in numerous national news publications with a combined print, and, internet, readership in excess of 300,000 people. In support, I attach the "G" series of exhibits, including: a recent ad in the American Free Press newspaper, identifying me as a writer for that newspaper Exh G(a); the masthead of the First Freedom newspaper, identifying me as a member of that newspaper's Editorial Board Exh G(b); and, articles published since my imprisonment in the American Free Press, First Freedom, Barnes Review, Northwest Observer, and, Citizen's Informer publications Exh G(c)-(g).

Three general categories of FOIA claims are presented here:

1) The vast majority of these claims have been administratively defaulted by the receiving agency. These defaults generally involve not having responded to the request at all. Some involve violating FOIA's requirement for a response, or, extension of time to respond, within 20 days, or, the requirement that an agency not make more than one request for clarification.

2) The second category of request is exhausted requests where the agency denies having any responsive records, but, public sources show that the agency must have some responsive records.

request being withheld pursuant to 5 USC §552 (b)(6), or, (7)(C).

These subsections involve personnel records where such records would constitute an unwarranted invasion of privacy. Here, I raise two questions: a) can every record related to a person's name be considered a "personnel" record under these subsections; and, b) is release of the record an "unwarranted" "invasion of privacy." The material presented shows that the records requested are not protected personnel records, and, that the subjects where they are still alive, have either waived this right by publicly discussing their involvement as an FBI-JTTF informant, or agent, with the media, or, because of the misconduct involved in this operation, release is otherwise warranted.

The Court may note a recent admission by the United States made December 14, 2016, in the case United States v Henry (In Re: White) ED Va 07-cv-342, attached as Exh F(k). In Henry, the United States repeatedly lied to the Court, and, denied the existence of certain documents, calling me many names in the process, until December 14, when it admitted that it was withholding records pertaining to this unlawful FBI-JTTF operation, and, that it would make a public disclosure in February 2017. The United States has given me no formal notification that it will apply this to these FOIA requests.

Some of the records here are being otherwise withheld. Those special circumstances are discussed with each topic.

For each subject of records withheld, I have provided a header containing all relevant reference numbers, sorted by agency, reference to the administrative remedy exhibits, and, reference to any other related exhibits, or, federal cases.

1) William A White

FBI #1224695-000 Exh A(b)(i)-(ii)

USMS #2013USMS24506 Exh A(a)(i)-(ii)

BOP unknown

In December 2013, I filed FOIA requests with the FBI, USMS, and, BOP, for all records related to myself. I also requested additional records from the Bureau of Prisons, similar to the request in Exh B(a)(i). I made these requests from the Roanoke City Jail in Roanoke, Virginia, and, was unable to retain most of the related paperwork.

The FBI has identified at least 13, 926 responsive records, but, has stated that they will not make them available "for a very long time." All efforts to appeal this have been ignored.

The USMS literally closed their FOIA office, and, left no forwarding address. I obtained their new FOIA address in December 2016, but, an inquiry as to the status of the request has been ignored.

The BOP released about 53 pages of marginally responsive documents in 2013, and, ignored my appeal.

All of these requests are long defaulted by the executive agencies.

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Beginning July 18, 2016, I began making new FOIA requests to federal agencies. After filing the initial complaint in this matter, these agencies stopped ignoring me, in part. What follows are the request by subject with a summary of the status, and, the basis for relief.

2) William A White

BOP #2016-07558 Exh B(a)(i)-(v)

BATF no number assigned Exh C(a)

I reinitiated my BOP FOIA, and, initiated a new FOIA with the Bureau of Alcohol, Tobacco, and, Firearms. The BOP FOIA was last answered September 26, 2016, with a determination that it would take up to nine months to process my request. I timely appealed the time frame determination October 3, 2016, but, never received a response.

The BATF request was made November 27, 2016, but, was also not responded to.

Both agencies are in default, and, the Court should order them to immediately produce all records in their possession relating to me.

3) MCC-Chicago SHU Records #1

BOP #2016-07558 Exh B(a)(i)-(v)

I have asked the Bureau of Prisons to provide all records from the Metropolitan Correctional Center -- Chicago from the period of about October 17, 2008, to December 29, 2008, relating to the operation of the 11th floor Special Housing Unit, including records of heating problems, insect infestations, and, the flooding of cells with human fecal material, as well as the green SHU log books. The Bureau of Prisons, on September 26, 2016, stated that it would take up to nine months to respond. I timely

like my records.

4) MCC-Chicago Records #2

BOP #2017-01269 Exh B(b)(i)-(iv); (a)(v)

On November 20, 2016, I filed FOIA for the SHU visitor entry logs for MCC-Chicago from January 1, 2011, to April 20, 2011.

The purpose is to confirm the identities of two sets of individuals, purporting to be FBI agents, who attempted to question me during this period. The BOP asked for an extension of time to respond December 2, 2016. I appealed December 11, 2016. This was denied December 21, 2016. I filed an appeal to Office of Information Programs (OIP) December 30, 2016.

This item is not administratively exhausted.

5) Any Group, Or Operation, Associated With 480 Sherwood Dr  
Lexington, South Carolina

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a); F(b)(i)-(iv)

The Court should review Exh F(a), to get an overview of the FBI-JTTF operation as it intersected with 480 Sherwood Dr in Lexington, South Carolina. Essentially, the FBI-JTTF, in conjunction with the family of federal informant Joshua Caleb Sutter, acquired this mobile home, and, turned into a revolving "compound" for whatever it felt like investigating that day. At times, this was a cult devoted to Jim Jones, and, Pol Pot, at time it was an "Aryan Nations" headquarters, at times it was the headquarters of the pro-North Korea "Rural People's Party", at times it was a biker gang clubhouse. I would like all documents on all operations involving this property. There

cluding: the attempted murder of one subject of the investigation; numerous threats, and, other crimes of violence; alleged sexual exploitation of one of the subjects of the investigation; the financing of a real Satanic cult, of which the informants involved were members; and, the general civil rights violations inherent in the nature of the investigation.

As with each of the cross-references below, I made a FOIA request on this subject to the FBI July 18, 2016, to the BATF November 27, 2016, and, to the USMS December 15, 2016, but received no responses. I am entitled to information on the operations of federal law enforcement agencies, and, would like the records on all operations intersecting with this property.

5(a) Cross-Reference: Any group in South Carolina claiming affiliation with al-Qaeda

5(b) Cross-Reference: Russian Defense League

5(c) Cross-Reference: Any person, or, entity, in Massachusetts New York, New Jersey, or, South Carolina, claiming affiliation with Alexander Dugin, or, the Donetsk, or, Luhansk, People's Republics

As discussed in greater detail infra, the 180 Sherwood Dr property was used to run numerous operations. In one, federal informant Joshua Caleb Sutter persuaded subject August Kreiss III to appear on local television, and, declare loyalty to "al-Qaeda." In another, federal informant James Porrazzo made links to a group called the Russian Defense League as part of an FBI-JTTF effort to target supporters of the Donetsk, and, Luhansk, People's Republics, and, their ideological inspiration, Russian thinker Alexander Dugin.

As with the main subject, the various agencies have defaulted their response to these cross-references. These topics re-

relevant documents.

6) The Rural People's Party

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a);(b) (i ) p 9-10, 15, 17-18, 20-

26

The Rural People's Party was a fraudulent pro-North Korean organization run from the compound at 480 Sherwood Dr. I requested these documents from the FBI July 18, 2016, from the BATF November 27, 2016, and, from the USMS December 15, 2016. I received no responses, and, the agencies are in default.

These documents relate to the operations of the respective agencies, and, I am entitled to them.

6(a) Cross-Reference: US Songun Study Group

6(b) Cross-Reference: United Juche Front of North America

6(c) Cross-Reference: US Juche Study Group

6(d) Cross-Reference: Swords of Songun

6(e) Cross-Reference: Groups in Massachusetts, New York, New Jersey, and, South Carolina, affiliated with North Korea

6(f) Cross-Reference: An operation run out of the Pahlevi Building in New York, NY, by informants claiming to be Iranian Major General Khosrowdad (deceased), "the twin brother of the Shah of Iran", "Princess Ashraf of Iran", and, Iranian terrorists (2008 to present)

6(g) Cross-Reference: FBI-JTTF Infiltration Of Korean Language Classes In New York City

6(h) Cross-Reference: Manchuko Temporary Government

All of the above are various aspects of the FBI-JTTF's anti-North Korea operation. The governing philosophy of North



Korea is called "Juche-Sogun". The United States infiltrated an existing group, the US Songun Study Group, which was officially approved by North Korea, and, whose leaders had travelled to North Korea. It also set up several bizarrely named false front groups to interfere with the activities of the US Songun Study Group. There is an allegation that informant Joshua Caleb Sutter with informant Jilian Hoy attempted to murder investigation subject John Paul Cupp, leader of the US Songun Study Group. I have also had correspondance with Jason Adam Tonis, a subject of the investigation, that alerted me to the FBI-JTTF infiltration of Korean language classes, and, the Pahlevi building sting operation.

Subjects 6(a)-(e) were first presented to the FBI in FOIA July 18, 2016. Subjects 6(f)-(h) were first presented on December 1, 2016. All subjects were presented to the USMS December 15, 2016. Subjects (a)-(e) were presented to the BATF November 27, 2016. None of these agencies have responded. This requests are for documents related to the operations of federal agencies, and, I am entitled to their release.

8) Joshua Caleb Sutter aka David Woods aka Tyler Moses, aka Shree-Shree Kaliki-Kalki Mandir aka Stephen Brown

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 71-75, 78, 87, 91-92, 98-

99; (b)(i) p 7-12, 14-18, 20-21, 23-24, 29-30; (ii) p

3-7;(iii)(iv) United States v Sutter Case No: 03-MJ-00127

-1 (ED Pa)

Joshua Caleb Sutter is the primary FBI-JTTF informant in the 480 Sherwood Dr operation. Sutter is a former Aryan Nations member who was arrested in 2003 for attempting to purchase explos-



ives, and, automatic weapons, in furtherance of a plot to bomb abortion clinics. He served 22 months in prison, and, upon release became an informant. He has been accused of committing numerous crimes in this role, including attempting the murder of John Paul Cupp, and, threatening many, many, people, including a witness in my case. He is also accused in my habeas pleading of committing many of the crimes which I am convicted of, an allegation which the United States, in ED Va 07-cv-342, chose not to "confirm, or, deny."

I first requested records on Sutter from the FBI July 18, 2016. No response was received. I requested records from the BATF November 27, 2016, and, the USMS December 15, 2016. Again, no response was received.

Sutter has not been acting in the capacity of a private citizen during this operation, thus, he had no reasonable expectation of privacy in his actions. Further, release of the relevant records is warranted by the abundance of evidence of government misconduct relating to Sutter.

9) Jilian Hoy aka Comrade Morrison aka Jayalita Desi Dasi

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 74;(b)(i)p 15, 18, 20, 24-25, 29

Jilian Hoy is the wife of Joshua Caleb Sutter. She is also an informant, and, is also accused of the attempted murder of Cupp in the course of her employment. Further, she has been accused of sexually seducing Cupp in the course of her employment with the FBI-JTTF.

I first requested information on Hoy July 18, 2016, from the FBI. I requested it from the BATF November 27, 2016, and, from

es.

Hoy was not acting as a private citizen when she participated in the FBI-JTTF operation, thus, she had no reasonable expectation of privacy. Further, release is warranted because of the alleged misconduct surrounding the FBI-JTTF operation.

10) Jason Adam Tonis

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 71, 74, 92;(b)(i) p 25-27,  
30-32; (ii ) p 4, 7; (iv)

Jason Adam-Tonis was one of the targets of the FBI-JTTF anti North Korea operation. In particular, on December 31, 2011, he was threatened by FBI-JTTF informant James Porrazzo, infra, in a manner utilizing almost the exact same language as the phony threats that I was convicted of making in MD Fl 13-cr-304. As Porrazzo has confessed to stealing my identity, and, using it to commit crimes, I would like this file to show that Porrazzo had a history of the conduct, and, in fact, did commit the conduct, that I was convicted of. Tonis' FBI file would be useful in this regard.

I first requested Tonis' records from the FBI July 18, 2016, and, received no response. Similar requests were made to the  
BATF on November 27, 2016, and, the USMS on December 15, 2016,  
also to no response. Tonis does have an expectation of privacy in his records, but, the public interest in exposing the fact that FBI-JTTF informants were committing crimes against the subjects of FBI-JTTF operations in order to protect those operations is sufficient to warrant the release of Tonis' records, at least insofar as they intersect with either the FBI-JTTF operation, or,

- 11) John Paul Cupp
- 12) Kevin Walsh
- 13) Zaid Shakar al-Jishi
- 14) Emily Rotney
- 15) Chris Hayes
- 16) Kent McLellan

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 74; (b)(i) passim  
Each of these individuals was involved in the anti-North

Korea branch of the operation. Hayes, as discussed below, was also involved in the American Front branch of the operation. All were targets, to my knowledge, except Rotney, who is the girlfriend of Porrazzo, and, likely, an FBI-JTTF informant.

I first requested this information from the FBI July 18, 2016, and, received no response. Similarly, I requested this information from the BATF November 27, 2016, and, from the USMS December 15, 2016, also to no response.

Each of these individuals, except insofar as they were working for the United States, does have a reasonable expectation of privacy in their records. However, the government misconduct in this case warrants release of these records insofar as they intersect with the FBI-JTTF operation.

- 17) New Bihar Mandir Temple

FBI no number assigned Exh(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents; Exh F(a)(i) p 8-9, 21-25, 29, 30

This is a name of the Satanic cult which the FBI-JTTF was financing at the 480 Sherwood Dr property. I first requested

these records from the FBI July 18, 2016, and, received no response. Similarly, I requested the records from the BATF November 27, 2016, also receiving no response, and, requested the records from the US Marshals Service December 15, 2016, to no response. These are records of government operations, and, I am entitled to their release.

18) American Front

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 91-92, 95-96; (g)(i)-(iii)

The American Front is a skinhead gang that was targeted by the FBI-JTTF operation, including by informants James Porrazzo, Joshua Sutter, and, Jason Hall, acting under the direction of TFO Kelly Boaz. During the course of the FBI-JTTF investigation, the leader of the American Front was murdered, and, members of the group, at the direction of Porrazzo, and, Sutter, conspired to murder me. Though I had no relationship to the American Front, I was tried, and, convicted, of sending threats to obtain the release of American Front members. All of those whose release was sought in the threats were later released, or, not federally charged, after it was discovered that TFO Boaz had perjured himself in the affidavit he swore out for their arrest.

I initially made request to the FBI for these records on July 18, 2016. No response was ever received. Similarly, I made request to the BATF November 27, 2016, and, the USMS December 15, 2016. All of these agencies are in default. These agencies' records relating to the American Front demonstrate the operations of federal law enforcement agencies, and, thus, may not be withheld. I would like all records ordered released.

18(b) Cross-Reference: Green Star

After murdering David Lynch in the course of his employment with the FBI-JTTF, James Porrazzo gained control of the American Front, and, gave it the names "New Resistance", and, "Green Star." Both of these subjects were first presented to the FBI July 18, 2016, to the BATF November 27, 2016, and, to the USMS December 15, 2016. No response has been received from any agency.

19) David Lynch (deceased)

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a)(i) p 91-92

David Lynch is the former leader of the American Front who was murdered at his home in California, apparently by informants or, agents, of the FBI-JTTF operation, including James Porrazzo. As Lynch is deceased, there is no basis for the United States to withhold his records. I first raised this subject with the FBI on July 18, 2016, with the BATF November 27, 2016, and, with the USMS December 15, 2016. None of these agencies responded.

20) James Porrazzo

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a)(i) p 69-72; Exh F(b)(i) p 15, 24-25, 27-31; (ii) p 3-4, 7-9

James Porrazzo was the leader of the American Front prior to 2002. He was jailed in 2002 for drug offenses. Upon release from prison in 2007, Porrazzo began working with Sutter in the

the FBI-JTTF in investigating a plot to kill him by Blood and Honour, and, Combat 18 , rival skinhead groups. Porrazzo likely committed, or, caused to be committed, the murder of David Lynch while acting within the scope of his employment with the FBI-JTTF. Porrazzo has threatened numerous people in order to protect the FBI-JTTF operation, and, conceal his role in it. He has also told others that he stole my identity, and, committed the crimes for which I am currently imprisoned.

Because Porrazzo's file contains material gathered while Porrazzo was acting within the scope of employment for the federal government, Porrazzo does not have a reasonable expectation of privacy in that material. Further, release of this material is warranted because it will reveal wrongdoing by a federal law enforcement agency.

I first presented this request to the FBI July 18, 2016, to the BATF November 27, 2016, and, to the USMS December 15, 2016.  
I have received no response.

21) Aryan Nations (Pennsylvania or South Carolina)

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh D(a)

USMS no number assigned Exh C(a)

Related Documents: Exh F(a) p 65-68, 73-75, 78, 83-84, 87-

90; Exh F(b)(i) p 8-9, 11-12; Exh F(c)(i) p 56-64,

95-112 (mistakenly called the "Ku Klux Klan"); United

States v Kreis 474 Fed Appx 370 (4th Cir 2012); Sutter

During the course of the FBI-JTTF operation, the FBI-JTTF essentially took control of the Aryan Nations, including groups it created led by August Kreis III, and, Rick Spring. Kreis is a mentally disabled man from Pennsylvania, and, a self-proclaimed

Aryan Nations leader. The FBI-JTTF first lured him into moving from Pennsylvania to South Carolina, then placed him on television, where he declared allegiance to "Adolf Hitler, and, al-Qaeda". The FBI-JTTF then built a phony biker gang around Kreis, and, used this phony gang to target both the American Front, and, the Outlaws motorcycle club. Kreis himself was eventually convicted of a petty fraud involving his SSI-Disability check.

The FBI-JTTF's operation of the Aryan Nations is a public government function, and, documents relating to this are subject to FOIA. I first requested these documents from the FBI July 18, 2016, from the BATF November 27, 2016, and, from the USMS December 15, 2016. I have received no response.

21a) Cross-Reference: Church of Jesus Christ Christian

I did not present this subject, but, for the information of anyone attempting to resolve this claim, the Aryan Nations is also known as the Church of Jesus Christ Christian.

22) August Kreis III

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 74-75, 87-89; Exh F(b)(i)  
p 8, 11-12; Kreis

As described above, August Kreis III was used by the FBI to create, and, lead, a number of false organizations that were fronts for the FBI-JTTF operation. Kreis does have a privacy interest in his records, but, release is warranted because of the importance of showing how the FBI-JTTF used Kreis to create a public perception of "domestic terrorism" threats were no such threats existed.

I first presented this topic to the FBI July 18, 2016, to

No response was ever received.

22) Jason Hall

FBI 1358523-000 Exh E(a)(iii); (j)(i)-(v)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 91-92, 95; (g)(i)-(iii)

Jason Hall was a federal informant in the American Front investigation. He testified at the Florida state trial of Marcus Faella as to the case agent, TFO Boaz, having used perjury to obtain the arrests of the 14 arrestees in the case. Hall did not have a reasonable expectation of privacy in his work for the federal government, and, because information related to his activities will likely uncover government wrongdoing, the release of his files are warranted.

The FBI last responded to this FOIA request on November 27, 2016, and, is in default. Request was made to the BATF November 27, 2016, and, to the USMS December 15, 2016, and, no response was received.

23) Rick Spring

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 78; (c)(i) p 55-66

Rick Spring was an FBI-JTTF informant who was also set up as the leader of a branch of the Aryan Nations. Spring had no reasonable expectation of privacy in his work for the FBI-JTTF, and, release of his records are warranted because they are likely to show government wrongdoing, such as the FBI-JTTF's almost exclusive use of individuals who, like Spring, are addicted to drugs



ation. The FBI last responded to this request November 2, 2016, and, is in default. Requests were made with the BATF November 27 2016, and, with the USMS December 15, 2016, and, neither has responded.

24) Operation Primitive Affliction

FBI 1358511-000 Exh E(a)(iii); (i)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) passim; (c)(i) passim; (d); (e)(i)-(v); (f)(i)-(ii); (g)(i)-(iii); (h)(i)-(vi)

On October 17, 2016, the FBI identified, and, agreed to release, 12, 500 pages of documents related to Operation Primitive Affliction, which is the name of the FBI-JTTF operation, or, some part of that operation. No documents have been released, and, no extension of time has been requested. This places the FBI in default. Requests were made to the BATF November 27, 2016, and, to the USMS December 15, 2016. No response has been received.

25) 1st SS Cavalry Brigade

FBI 1357551-000 Exh E(a)(ii); (c)(i)-(viii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 87-89; (d); (e)(i)-(v); (f)(i)-(ii)

The 1st SS Cavalry Brigade was a phony "neo-Nazi Muslim Biker gang" set up by the FBI-JTTF operation, which used Kreis as the group's nominal "leader". The gang was, in turn, used to infiltrate the Outlaws Motorcycle Club, and, the American Front group. The gang operated, in part, out of the 480 Sherwood Dr property, and, appears to have morphed into the Soul Survivors

The records of this investigation, which was closed in 2012 with numerous arrests, were approved for release October 4, 2016, by the FBI. On November 14, 2016, the FBI revoked this approval on the basis that an ongoing law enforcement investigation had been opened involving these records. I believe that this refers to an internal affairs investigation into this investigation. The FBI last responded to my appeals on December 16, 2016, and, is in default. Requests were made to the BATF November 27, 2016, and, to the USMS December 15, 2016. No responses have been received.

25a) Cross-Reference: Outlaw Bikers (Osceola County, Florida)

FBI 1357563-000/001/002 Exh E(a)(i); (d)(i)-(vi)

OIP DOJ-AP-2017-000381

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 87-89; (d); (e)(i); (f)(i)-(ii)

The FBI claims not to have any responsive documents on this subject. This is hard to believe, as the FBI arrested six members of the Osceola County, Florida, Outlaw Bikers motorcycle club as part of Operation Primitive Affliction, and, the 1st SS Cavalry Brigade investigation. At least one of the arrests in this investigation, that of Deborah Plowman, was overturned because of the perjury of TFO Kelly Boaz.

This request was exhausted, and, denied, by the FBI. It was submitted to the BATF November 27, 2016, and, the USMS December 15, 2016. Neither request was answered.

26) TFO Kelly Boaz aka Kevin Post

FBI 1357439-000 Exh E(b)(i); (h)(i)-(v)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 85-92, 95-98; (d); (e)(i)-(v); (g)(i)-(iii)

TFO Kelly Boaz is an Orange County, Florida, Sheriff's Deputy assigned to the FBI-JTTF task force. Boaz has a long history of fabricating evidence, perjury, civil rights abuses, and, murder, prior to his participation in the FBI-JTTF operation. In the FBI-JTTF Operation, Boaz swore out at least fifteen false warrants to obtain the wrongful arrests of subjects. Boaz also as case agent likely directed the criminal activities of Porazzo, and, Sutter, in furtherance of the FBI-JTTF operation's goals.

Boaz has no reasonable expectation of privacy in his work for a public agency. Further, release of the documents is warranted because of the amount of clear, and, admitted, wrongdoing Boaz was engaged in in furtherance of the operation.

27) Brian Klose

28) Deborah Plowman

29) Harold "Hippie" Kinlaw

30) Carlos DuBose

FBI 1357439-000 Exh E(a)(i); (h)(i)-(v)

OIP DOJ-AP\_2017-000474

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(d); (e)(i)-(v)

These four were targets of the Outlaw Bikers portion of the FBI-JTTF operation. TFO Boaz has admitted in Plowman as to having wrongfully obtained Plowman's arrest through perjury. Though each of these individuals has an expectation of privacy in their

in obtaining these arrests outweighs the privacy concern, and, warrants release.

The FBI last responded to this request November 1, 2016, and is in default. Requests were made to the BATF November 27, 2016, and, the USMS December 15, 2016, and, no response was received.

31) Kristy Pryzbylla aka "Sin"

32) Ronald Cusack

33) Peter James

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(e)(i)

These three individuals were additional targets of the Out-law Biker portion of the FBI-JTTF operation. Release of information in their files will help expose the wrongdoing of TFO Boaz. The FBI last responded to this subject November 2, 2016, and, is in default. Requests were made to the BATF November 27, 2016, and, to the USMS December 15, 2016. No response was received.

34) National Socialist Movement

FBI 1357593-000 Exh E(a)(ii); (g)(i)-(x )

OIP DOJ-AP-2017-000064; DOJ-AP-2017-00085

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 80-84, 89; (c)(i) p 115-157

(h)(i)-(vi); (i)(i)-(ii); (j)(i)-(ii)

The FBI-JTTF took control of the National Socialist Movement no later than 2004, and, likely, much earlier. During the period 2004-2008, the FBI-JTTF would use the National Socialist Movement

to hold phony "white supremacist" rallies, and, to give legitim-

acy to local FBI-JTTF operations, which would form "units" of the National Socialist Movement. The FBI-JTTF would schedule the rallies for federal holidays, and, then, its agents would put in for substantial amounts of holiday pay, as well as travel pay, in order to monitor these rallies that they, themselves, were organizing. The FBI-JTTF would also arrange for violent counter-demonstrations against these rallies through informants in groups such as Anti-Racist Action in order to win approval for treating them as "Special Events". The BATF was also using the NSM in a similar manner. Neither party was disclosing to the public that these rallies were fraudulent. Instead, the federal government was using these rallies to make it appear as if there was a "domestic terrorism threat" when no such threat existed. Further, the FBI's Counter-Terrorism unit distributed false internal reports to FBI field offices, instructing field offices to open "terrorism" investigations into NSM "leaders" who were actually also federal informants.

This operation went dormant early in the Obama administration, but, was reactivated in 2015 after the Roof shooting in Charleston, South Carolina. In 2016, the NSM, under a myriad of names, has held false flag rallies at national parks, and, statehouses, across the United States, including in California, Georgia, New York, Ohio, and, Tennessee.

The FBI has made two partial releases of documents in this matter. However, I have requested all documents. While there is ongoing administrative remedy, the FBI has not fulfilled its responsibility to provide all documents within 20 days. Request was made to the BATF November 27, 2016, and, was not answered. A request made to the USMS December 15, 2016, was also not an-

34(a) Cross-Reference: Aryan Strike Force

FBI 1359366-000 Exh E(b)(iv); (k)(i)-(iv)

OIP DOJ-AP-2017-000520

Related Documents: Exh F(h)

The Aryan Strike Force is the name of a "security unit" recently established by the National Socialist Movement, and, the FBI-JTTF. This topic was administratively exhausted with the FBI December 12, 2016. It is part of the BATF, and, USMS requests.

34(b) Cross-Reference: Aryan Renaissance Society

FBI 1359374-000 Exh E(b)(iv); (n)(i)-(ii)

The Aryan Renaissance Society is the name of an NSM affiliate in Texas which hosted a "Blue Lives Matter" event. The FBI has not responded to this topic since October 18, 2016, and, is in default, as are the BATF, and, USMS.

34(c) Cross-Reference: Blue Lives Matter (Texas)

FBI 1359397-000 Exh E(b)(iv); (r)(i)

Blue Live Matter is a name under which the NSM sponsored a rally in Texas. The FBI has not responded to this topic since October 18, 2016, and, is in default. The BATF, and, USMS, are in default as above.

34(d) Cross-Reference: White Lives Matter

FBI 1359403-000 Exh E(b)(iv); (t)(i)-(iii)

White Lives Matter is a name under which the NSM has recently conducted events in Ohio, and, New York. It is led by Rebecca Barnette, infra. The FBI issued final denial of release of this topic December 23, 2016. The BATF, and, USMS, did not respond, as above.

34(e) Cross-Reference: Soul Survivors Motorcycle Club

FBI 1357558-000/001; Exh E(a)(ii); (c)(i)-(iv)

Related Documents: Exh F(a) p 89

The Soul Survivors are a phony motorcycle club comprised of FBI-JTTF officers. This group has affiliated as the Georgia state unit of the NSM, and, in April 2016, it was involved in phony "neo-Nazi", and, "KKK", events held at Stone Mountain National Park, and, in Rome, Georgia. The group also controls a presumably seized biker bar/clubhouse which it is using in furtherance of the FBI-JTTF operation. This gang appears to be a continuance of the phony 1st SS Cavalry Brigade operation.

The FBI has not responded to this subject since September 30 2016, and, is in default. Requests were made to the BATF November 27, 2016, and, to the USMS December 15, 2016. No responses were received.

34(f) Cross-Reference: Aryan Nationalist Alliance

FBI 1359414-000 Exh E(a)(ii); (u)(i)-(ii)

OIP DOJ-AP-2017-000726

Related Documents: Exh F(h)(i)-(ii)

The Aryan Nationalist Alliance is another front name created by the FBI-JTTF operation for use by the National Socialist Movement. It is also being used by the Traditionalist Workers Party, discussed infra.

35) Steve Bowers

FBI 1359387-000 Exh E(b)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(i); Exh G(a)

Steve Bowers is the long-time prison coordinator for the



NSM. He was brutally beaten at a Nordfest event in early

2006 by members of the Vinlanders Social Club, discussed infra, acting at the direction of FBI-JTTF informants within that group. He has recently appeared at events associated with the FBI-JTTF operation.

Bowers has a privacy interest in his records insofar as he is not acting in the course of employment by the FBI-JTTF operation. However, the wrongdoing of the FBI-JTTF operation, particularly in regard to the 2006 attack on Bowers, warrants release of related FBI files.

The FBI has not responded to this request since November 2, 2016, and, is in default. The BATF did not respond to a November 27, 2016, request, and, the USMS did not respond to a December 15 2016 request.

36) Rebecca Barnette

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(iv)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(i),(v)-(vi)

Rebecca Barnette is the "White Lives Matter" coordinator for the NSM. Several FBI-JTTF events, including an event in Ohio, and, an event in Buffalo, New York, where several people were assaulted, and, injured, have been held under the "White Lives Matter" name. Barnette has a privacy interest in her records except insofar as she is acting the course of employment for the federal government. But, the intersection of her activities with several aspects of the FBI-JTTF operation, and, the violence at her events attributable to that operation, warrant release of her files.

The FBI last responded to this subject November 2, 2016, and



is in default. The BATF did not respond to a November 27, 2016, request, and, the USMS did not respond to a December 15, 2016, request.

37) Christopher Drake

FBI 1359387-000 Exh F(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Christopher Drake was the Georgia state leader for the National Socialist Movement. In 2008, he left to become the Southern Regional Leader for the American National Socialist Workers Party. I believe that Drake is an FBI-JTTF informant for several reasons, including: One, Drake has made statements to me about his past, including, allegedly, spending time in federal prison, for which there are no verifying records. Two, Drake's wife, Kelly, made comments to me in 2008 indicating that she had information on me from a "them", and, that "they" stated various things that, to my knowledge, have only been believed by federal agents.

Insofar as Drake has acted in the scope of employment by the FBI-JTTF, he is not entitled to an expectation of privacy in his records. Further, the general wrongdoing, and, wrongful purpose of the FBI-JTTF operation warrant release of his records.

38) Jeff Schoep

FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 80-83; (c)(i)-(ii)

Jeff Schoep is the Commander of the National Socialist Movement. I believe him to also be an informant for federal law en-

enforcement, likely the FBI-JTTF. I worked directly with Schoep during the period 2005 to 2006. During this period, I knew Schoep to frequently lie, particularly to cover for the introduction into the NSM of members who were clearly either law enforcement, or, criminals, and, likely, informants. Schoep frequently asked me to go various places to perform tasks that only advantaged the FBI-JTTF operation, either by adding legitimacy to their front groups, or, to get me away from situations, such as the Toledo riots, where the government had lost control of their operation. For over a decade, Schoep has knowingly hosted scores of FBI-JTTF, and/or, BATF, sponsored phony events. It is virtually impossible for Schoep not to know that he is acting primarily in the interests of the FBI-JTTF operation, and, not in his own interests, if he was a sincere advocate for National Socialism.

Insofar as Schoep has been acting in the scope of his employment for the federal government, he has no expectation of privacy. Through Schoep's activities, scores of phony public events have been held by the FBI-JTTF, misinforming the public about supposed "racism", and, "domestic terrorism". Federal agents have used these activities to improperly enrich themselves by scheduling their fraudulent events on federal holidays, and, by collecting overtime, holiday, and, travel, pay. Scores of people have been injured at these events, and, hundreds arrested. All of this government wrongdoing warrants ordering the release of Schoep's federal law enforcement files.

The FBI has not responded to this subject since December 9, 2016, and, is in default. The BATF did not respond to a request made November 27, 2016. The USMS did not respond to a request made December 15, 2016.

BATF no number assigned Exh C(a)

In 2005, rioting erupted in Toledo, Ohio, after a planned NSM march turned bad. The local NSM unit was being run from the Lucky Duck Tattoo Parlor (if I recall the name correctly), which I believe was a BATF storefront operation. Essentially, the BATF associated their storefront operation with the NSM, and, called the phony march to build legitimacy for the operation. Due to interference from law enforcement in our gathering plan, specifically, the choice of law enforcement to take over a parking lot that we had intended to use, and, to direct our marchers through a mob that had also been organized by the FBI-JTTF, rioting occurred.

I know that this, and, the Bowling Green, Ohio, unit of the NSM were ATF operations because FBI reports released in relation to a 2006 Orlando march refer to three ATF informants who attended. These informants could only be the Bowling Green unit leader Mark Martin, and, two Toledo, Ohio, unit members who travelled with him.

Request was made to the BATF November 27, 2016. No response was received. Obviously, the government wrongdoing in starting a riot that led to over 400 arrests, over 100 convictions, and, the burning of several buildings, warrants release of these documents.

40) Ron Wolf

FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Ron Wolf was the NSM Toledo unit leader who called the march that led to the riots. I had noted him as an informant when he

but, insisted on taking a role as "security". Federal informants typically seek "security" positions; I have never known a legitimate white nationalist organization to have a "security" unit. Wolf is a BATF informant. As such, he has no reasonable expectation of privacy in acts performed in the scope of his employment with the federal government. Also, the government wrongdoing in allowing, or, causing, the rioting in Toledo, Ohio, in 2005, warrants release of these records.

41) League Of The South

FBI 1357582-000/001 Exh E(a)(ii); (f)(i)-(ix)

OIP DOJ-AP-2016-005702; DOJ-AP-2017-000383

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 73, 78; (b)(iii); (c)(i)

85-91

This topic has been completely exhausted, with the FBI denying that they have records in support of this subject. This is one of the more outrageous denials, and, shows the problems with the way that the FBI is using the exemptions for personal records improperly to prevent disclosure of records on groups, and, organizations. There are two documents in the exhibits that show that: 1) Joshua Sutter's father, David Sutter, managed the League of the South's main store, where the younger Sutter worked; and, 2) that David Gletty, by his own admission was tasked to infiltrate this group. Rather than index this investigation under "League of the South", though, the FBI has indexed it under Sutter's, and, Gletty's names, and, is refusing to release the records under those names citing (b)(6), and,

like the records released.

Also, request was made to the BATF November 27, 2016, and, was ignored. Similarly, the USMS ignored a December 15, 2016, request.

42) Confederate Hammerskins

FBI 1357585-000/001/002 Exh E(a)(ii); (g)(i)-(xii)

OIP DOJ-AP-2017-000066

BATF no number assigned Exh D(a)

USMS no number assigned Exh C(a)

Related Documents: Exh F(a) p 78, 84; (c)(i) p 25-52, 153-164

The Confederate Hammerskins are a skinhead gang which the FBI has been investigating since 1987/1988. The FBI has released two sets of documents, about 600 pages overall, to me, covering the period 1987-1996. However, I have requested all documents on this subject. I know from Gletty's book that the FBI used the NSM to infiltrate a group of Confederate Hammerskins in Florida, resulting in the arrest of Tom Martin, and, John Rock. As these arrests were part of the unlawful FBI-JTTF operation, and, Gletty states that he used the Hammerskins to conduct unlawful surveillance of law abiding citizens, I would like the entire file.

The BATF ignored a request for information made November 27, 2016. The USMS ignored a similar request made December 15, 2016.

43) David Gletty

FBI 1357439-000 Exh E(a)(ii); (h)(i)-(v)

OIP DOJ-AP-2017-000474

USMS no number assigned Exh C(a)

BATF no number assigned Exh D(a)

Related Documents: Exh F(a) p 76-84; (c)(i) passim

David Gletty was a key FBI-JTTF informant in the unlawful FBI-JTTF operation from 1999 to 2007, when he was discharged, apparently for unreliability. Gletty has written a book on his experiences as an FBI-JTTF informant, Undercover Nazi. In his book Gletty brags about the illegal things that the FBI asked him to do, and, the unlawful nature of the FBI-JTTF operation. Gletty states that the operation deliberately targeted law abiding citizens, including southern heritage groups, anti-immigrant groups, and, other relatively moderate conservative groups. Gletty states that the primary purpose of the FBI-JTTF operation was to gather information on American citizens engaged in First Amendment expression, and, association, which ran counter to the views of the Bush administration. Gletty admits to using cocaine during the course of his duties for the FBI-JTTF, to committing hate crimes, to directing a mob assault, and, to allowing other crimes to occur. Gletty states that the FBI intervened to protect him when he was arrested for committing violent felonies against innocent citizens.

Gletty certainly cannot have a privacy interest in acts he committed while in the pay of the FBI, and, about which he has not only written a book, but, promoted that book by referring to the credibility his story receives from his FBI files. Further, even if Gletty had a privacy interest, the fact that Gletty admits not only that the entire premise of his work for the FBI was illegal, but, that he actually committed violent crimes against innocent people as a part of his government employment, warrants release.

This complaint has been exhausted with the FBI. The BATF did not respond to a request dated November 27, 2016; the USMS did not respond to a December 15, 2016 request.

FBI 1357439-000 Exh E(a)(ii); (h)(i)-(v)

OIP DOJ-AP-2017-000474

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Document: Exh F(a) p 76-84; (c)(i) passim

"Joe" LNU was the informant-partner, and, also, homosexual partner, of David Gletty. Several pictures of him appear in Gletty's book, and, from personal experience with the two, Joe seems to have participated in every one of the criminal activities Gletty admits to, including the unlawful FBI-JTTF operation as a whole. Gletty also admits that Joe utilized cocaine with Gletty as part of the course of their employment with the FBI-JTTF. I would like Joe's last name, and, his files.

Joe does not have a privacy interest in his name, or, in activities which he committed during the course of his employment with the FBI. Further, the criminal acts which Joe participated in with Gletty, as well as the unlawful nature of the FBI-JTTF operation, warrant release.

This topic has been administratively exhausted with the FBI. The BATF did not respond to a request dated November 27, 2016, and, the USMS did not respond to a request dated December 15, 2016.

45) Maitland, Florida FBI SA Kevin Farrington

FBI 1357439-000 Exh E(a)(ii); (h)(i)-(v)

OIP DOJ-AP-000474

Kevin Farrington was one of two case agents assigned to Gletty, and, Joe. According to Gletty, Farrington instructed him to violate the First Amendment rights of American citizens because of their involvement in protected acts of expression. Far-



Farrington also told Gletty that the purpose of the FBI-JTTF operation was not to stop crime, but, to disrupt political associations. I am not asking the Court to order Farrington's medical records, or, his home address, released. I am asking for all records related to public functions that have been performed by Farrington during the course of his employment with the FBI. Farrington does not have a reasonable expectation of privacy in his public work, and, cannot evoke (b)(6) for records that would not be held exclusively in a personnel file.

The FBI has not responded to this subject since November 1, 2016, and, is in default. No other requests were made with other agencies.

46) Tom Martin

FBI 1357439-000 Exh E(a)(ii); (h)(i)-(v)

OIP DOJ-AP-2017-000474

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(c) p 27, 31-36, 155-157, 167-168

Tom Martin was a target of the FBI-JTTF operation who was convicted of a stash house robbery scheme in Florida suggested by Gletty. Martin does have a privacy interest in his records. However, release of the records is warranted in conjunction with the government wrongdoing in Martin's case that is alleged by Gletty.

The FBI has not responded to this request since November 1, 2016, and, is in default. The BATF did not answer a November 27, 2016 request, and, the USMS did not answer a December 15, 2016, request.

47) John Rock

FBI 1357439-000 Exh E(a)(ii); (h)(i)-(v)

OIP DOJ-AP\_2017-000474

BATF no number assigned Exh C(a)



USMS no number assigned Exh D(a)  
Related Documents: Exh F(c) p 27, 31-36, 155-157, 167-168

Like Martin, Rock was arrested in the same sting. Though he has a privacy interest in his records, the governmental misconduct surrounding his arrest warrants release.

The FBI has not responded to this subject since November 1, 2016, and, is in default. The BATF did not respond to a November 27, 2016, FOIA request, and, the USMS did not respond to a December 15, 2016, FOIA request.

47) James Logsdon aka James Langston aka James Lauston

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 79, 80, 114; (c)(i) p 69-71, 123; (i)(i)

In 2002, Matthew Hale, Pontifex Maximus of the World Church of the Creator, was arrested, and, charged, with soliciting the murder of US District Judge Joan Lefkow. The man who took over for Hale, James Logsdon, was a federal informant for the FBI-JTTF operation. Logsdon essentially ran the World Church of the Creator for the FBI-JTTF for several years.

Logsdon has no privacy interest in work that he performed while in the service of the federal government. As he was part of the FBI-JTTF's phony "white supremacist movement", was involved in misleading the public about the existence of a "domestic terrorism" threat from said phony "white supremacists", and, was seen by Gletty prolifically using cocaine while performing official duties for the FBI-JTTF, release of his records is warranted.

FBI 1362454-000 Exh E(a)(v); (x)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related documents: Exh F(a) p 84; F(i)

The Vinlander Social Club began as a group of individuals who were rejected by the Hammerskins, and, formed in Indiana as the Outlaw Hammerskins. By 2006, this group was under the control of the FBI-JTTF operation. In furtherance of the aims, and, objectives of the FBI-JTTF operation, the Vinlanders conducted numerous violent criminal acts, including a vicious attack on a group of NSM members at a concert called Nordicfest in 2006, and a hate crime assault on a black homeless man in Indiana. The Vinlanders were also tasked by the FBI-JTTF to provide "security" for the anti-immigrant meeting conducted by federal informant Matthew Parrott, discussed infra.

The FBI has not responded to this topic since December 9, 2016, and, is in default. The BATF did not respond to a November 27, 2016, request, and, the USMS did not respond to a December 15, 2016, request.

49) The American National Socialist Workers Party

FBI 1362474-000 Exh E(a)(v); (w)(i)-(ii)

The American National Socialist Workers Party is a group that I, and, 118 other dissident members of the NSM, founded in July 2006. The group was targeted by the FBI-JTTF operation not because we were breaking the law, but, because we were putting their phony groups out of business. In the course of this targeting, FBI-JTTF agents committed crimes using my identity, or, the identity of the group, without my knowledge, or, permission, and, then, framed me for those crimes.

The FBI last responded to this request December 1, 2016, and, is in default. The BATF ignored a request made November 27, 2016, and, the USMS ignored a request made December 15, 2016.

50) Traditionalist Workers Party

FBI 1359407-000 Exh E(a)(iv); (u)(i)-(iii)

OIP DOJ-AP-2017-000516

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(i)-(vi)

This topic has been administratively exhausted with the FBI,  
who denies having any responsive records. As with the League of  
the South, the FBI is obfuscating. The Traditionalist Workers  
Party was founded by Matthew Parrott, who, as discussed infra, is  
an FBI-JTTF informant. One of its leaders is Parrott's son-in-  
law Matthew Heimbach. Heimbach's main activity is liasoning with  
FBI-JTTF informants, like Jeff Schoep, promoting FBI-JTTF front  
groups like the NSM, and, the Aryan Nationalist Alliance, and,  
promoting phony FBI-JTTF rallies. Members of the Traditionalist  
Workers Party, including Heimbach, were also photographed fight-  
ing #BlackLivesMatter demonstrators at Trump for President ral-  
lies in early 2016, causing me to believe that the FBI-JTTF del-  
iberately attempted to interfere with the Trump Presidential  
campaign.

The FBI certainly has records on this organizat-  
ion. Either these records are indexed under a secondary subject  
header, or, they are being withheld as active law enforcement re-  
ords. If they are being withheld, the public interest in know-  
ing whether the FBI-JTTF is fabricating "white supremacism", and,  
"white supreamcist" rallies, and, whether the FBI-JTTF targeted  
the Trump campaign warrants release at this time.

The BATF did not respond to a request for these records dated November 27, 2016, and, the USMS did not respond to a similar request on December 15, 2016.

51) Matthew Parrott

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(iii), (iv)

Matthew Parrott is a long time informant for both the Indiana State Police, and, the FBI. He came to my attention after I met a woman named, I believe, Janelle, who had been involved in organizing anti-immigrant meetings with Parrott in Indiana. Janelle told me of Parrott's involvement with the Vinlander Social Club, a violent FBI-JTTF front group linked to the broader operation. After Parrott made some rude comments about me to Janelle, I investigated, and, found a mutual acquaintance who told me how Parrott was holding weekly meeting with the Indiana State Police, and, the FBI, to discuss "white supremacist gossip". After I mentioned this to Parrott, he stated that he was involved in said meetings.

During the dormant period of the FBI-JTTF operation, Parrott was parked within the ranks of the National Policy Institute (the "Heil Trump" group) for a few years, and, then, plucked out to be a leader of the Traditionalist Workers' Party.

The unlawful nature of the FBI-JTTF operation, and, Parrott's involvement in violence at Trump campaign rallies justify release of his FBI file. Parrott does not have a privacy interest in activities conducted at the direction of a federal law enforcement agency.

The FBI has not responded to this request since November 2,

2016, and, is in default. The BATF did not respond to a November 27, 2016, request, and, the USMS did not respond to a December 15 2016, request.

52) Matthew Heimbach

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP\_2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(i)-(vi)

Matthew Heimbach is the Chairman of the Traditional Workers Party. Former leader of Youth for Western Civilization, a university group, Heimbach is married to Brooke Heimbach, daughter of federal informant Matthew Parrott. Throughout 2016, Heimbach has been involved in promoting phony rallies, and, phony groups, controlled by the FBI-JTTF operation. Thus, either Heimbach is target of the FBI-JTTF operation, or, an informant.

Insofar as Heimbach is not in the employ of a federal law enforcement agency, he has a privacy interest in his records. However, as the focus of so much unlawful FBI-JTTF activity, the public interest in knowing whether FBI-JTTF agents have violated Heimbach's rights, as part of a program of civil rights violations, or, whether Heimbach has been used by the FBI to attempt to interfere with the Presidential election by attacking demonstrators at Donald Trump rallies, warrant disclosure of his files.

The FBI has not responded to this request since November 2, 2016, and, is in default. The BATF did not respond to a November 27, 2016, request, and, the USMS did not respond to a December 15 2016 request.

53) Rick Tyler

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Requested Documents: Exh F(h)(iii)-(iv)

Rick Tyler was a candidate for Congress in Cleveland, Tennessee. He ran under the slogan "Make America White Again". His campaign was targeted by the FBI-JTTF operation, who inserted informants, such as Matthew Parrott, into events held to support Tyler's campaign.

Tyler does have a privacy interest in his records. However, the misconduct by federal law enforcement agencies in targeting, and, infiltrating, Tyler's campaign with the intent of influencing a Congressional election is misconduct sufficient to warrant release of Tyler's file.

54) Golden State Skinheads (Sacramento, California)

FBI 1359374-000 Exh E(a)(iv); (m)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(vii)-(viii)

The Golden State Skinheads are the California affiliate of the "State Skinheads" network which is led by the Keystone State Skinheads. This network has allied with the Traditional Workers Party. In mid-2016, the Golden State Skinheads held a phony, FBI JTTF controlled rally at the Sacramento State House. Violence broke out, and, seven people were stabbed, as a result of a staged confrontation by the FBI-JTTF gone bad. Heimbach attended this rally.

The FBI has not responded to this subject since October 14, 2016, and, is in default. The BATF ignored a November 27, 2016, request, and, the USMS ignored a December 15, 2016, request.

FBI 1359390-000 Exh E(a)(iv); (q)(i)-(v)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(vii)-(viii)

The FBI had identified 17,750 pages of documents on this subject that are subject to release, a \$267.50 deposit has been paid. The FBI last responded to this request January 3, 2017, and, administrative remedy is ongoing. However, the FBI did not comply with its obligation to respond within 20 days.

The BATF did not respond to a request dated November 27, 2016, and, the USMS did not respond to a request dated December 15, 2016.

56) Ohio Council of Concerned Citizens

FBI 1359401-000 Exh E(a)(iv); (s)(i)-(iii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(h)(i)

A person, or, persons, using the name Ohio Council of Concerned Citizens appeared at a phony FBI-JTTF meeting held in Ohio in mid-2016 under the auspices of the NSM, and, the Aryan National Alliance. The name is fraudulent, an imitation of the Council of Conservative Citizens. As the meeting was set up by the FBI-JTTF, and, Gletty says that the purposes of these meetings are to record everyone in attendance, there must be some record of this.

This subject has been administratively exhausted with the FBI. A November 27, 2016, request to the BATF went unanswered, as did a December 15, 2016, request to the USMS.



FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

USMS no number assigned Exh C(a)

BATF no number assigned Exh D(a)

Related Documents: United States v Strom WD Va 3-07-cr-001/  
3-08-cr-008

Elisha Strom turned in her husband, Kevin Strom, founder of the group National Vanguard, after a domestic argument. K Strom had been collecting child pornography on his computer, and, been sexually stalking a nine-year old girl. E Strom subsequently became an informant for the FBI. An effort was made to assassinate E. Strom as she left the federal courthouse in Charlottesville, Virginia, leading to a shootout on I-64. The US Marshals then protected Strom, eventually by sending her to live with Chris Drake. E Strom then had affairs with both a US Marshal protecting her, and, with Drake. Later, E Strom was sent by federal law enforcement to monitor the National Congress of the American National Socialist Workers Party.

Subsequently, E Strom had a falling out with the US Marshal with whom she was conducting an affair. She called me, and, asked for my help killing both that Marshal, and, the Judge which she felt had sentenced her husband to too little time in prison. I thought this was a set up until I learned that E Strom was arrested in 2009 for stalking law enforcement officials involved in handling her husband's case. I did not assist her.

E Strom has a privacy interest in records only insofar as they pertain to activity that was not conducted in furtherance of a law enforcement operation. Because of the misconduct in her case, including the seduction of her by a US Marshal assigned to protect her, a seduction which led to violence, and, crimes,



ranted. Further, while I despise her husband, who is a pedophile, it is possible that this seduction tainted the evidence that she provided during her husband's trials for child pornography, and, child enticement, further warranting release.

The FBI has not responded to this subject since November 2, 2016, and, is in default. The BATF ignored a request dated November 27, 2016, and, the USMS ignored a request dated December 15, 2016.

58) Erica Hardwick-Hoesch

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Erica Hardwick, aka Erica Hoesch, is a former member of the National Alliance who was recruited as an informant by the USMS no later than 2002. I was photographed with Hardwick in a Bethesda, MD, parking lot in 2001 by the USMS, and, subsequently followed, and, photographed, several additional times, including at the Sarah McClendon Study Dinner at the National Press Club, which I used to attend weekly. Hardwick told me that she was recruited by a US Marshal who approached her at an Irish Pub in Arlington/Alexandria Virginia during a "Hammerfest" concert nearby. Her mission included stealing documents from the National Alliance, including membership lists, which she would turn over to the USMS, likely to assist the overall FBI-JTTF operation (or, it could have been an FBI Agent using a USMS cover). Hardwick would often provide me with the same stolen documents. Hardwick would also act as a liason to the press, and, was involved in infiltrating the American Friends of the British Nat-

Immigration and Naturalization Service with information that Mark Cotterill, the AF-BNP leader, was in the United States on a sham marriage, and, acting as an unregistered foreign agent. Hardwick then, at direction of the FBI-JTTF, leaked this information to Henry Schuster, a producer for CNN (and, later, for 60 Minutes). Schuster contacted me; I turned the information over the BNP.

Hardwick, and, I, had a falling out after I remarked to others that we had had a sexual relationship, something which she unbeknownst to me, was concealing from her boyfriend. This then led to Hardwick, with assistance from the FBI-JTTF, harassing me, and; my rental business. In particular, Hardwick was introduced by the FBI-JTTF to the local NAACP, which helped her organize a phony campaign claiming that I was being "racist" in my rental housing. The FBI, and, HUD, launched an investigation that uncovered no such evidence. However, in furtherance of this operation, Hardwick was permitted to vandalize houses that I owned, and, physically assault me. She was also given access to the media to spread these government-approved falsehoods.

Hardwick fell out of the informant business after she was imprisoned in Indiana for burglary, and, assaulting a police officer. She was briefly assigned to spy on "anti-racist" groups in 2004.

As Hardwick was acting in furtherance of the public activities of a governmental organization, she has no reasonable expectation of privacy in her records. Further, that Hardwick was both instructed to commit criminal acts to violate the First Amendment rights of law abiding citizens, and, was permitted to commit violent crimes against me, release of her files is warranted.

The FBI has not responded to this request since November 2, 2016, and, is in default. The BATF did not answer a November 27,

FOIA request.

59) Seminole County, Florida, Sheriff's Office work with FBI-

JTTF

FBI 1362476-000 Exh E(a)(v); (y)(i)

The FBI has not responded to this subject since December  
9, 2016, and, is in default. There is no question that the Sem-  
inole County, Florida, Sheriff provides services to the FBI-JTTF  
as a Seminole County Sheriff's Deputy, Debra Healy, testified as  
an expert on behalf of the FBI at my trials, and, stated that she  
was part of a Seminole County Sheriff contingent in the FBI-JTTF.  
Her testimony was also largely erroneous, as detailed in my hab-  
as complaints.

60) Brian Holland

FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 82-83; Exh F(j)(i)-(ii)

Brian Holland was a federal informant who was part of the  
FBI-JTTF operation. He was first assigned to infiltrate the  
staff of David Duke. He was then transferred to the NSM, where  
he was made "chief of security" after the departure of Richard  
Brunson, another federal informant. Holland, among other things,  
ran for Congress as part of a fraudulent campaign with FBI-JTTF  
support. Holland, a cocaine user, and, convicted bank robber,  
was later discharged from FBI service as unreliable, and, told  
his story to George Noory on Coast to Coast AM, a radio program.

Because Holland has discussed his activities publically, he  
can have no privacy interest in the work which he performed for  
the FBI. Because the FBI used Holland to tamper with an election

ens, release of his records is warranted. The FBI has not responded to this topic since December 9, 2016, and, is in default.

61) Harold Turner

FBI 1359387-000 Exh E(a)(iv); (o)(i)-(ii)

OIP DOJ-AP-2017-000521

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 78, 113-116; (i)(i)-(ii)

United States v Turner ED Ny Case No09-650

Harold Turner was an FBI-JTTF informant who was given a phony radio show on 91.9 FM in New York City, New York. On this program, at the instructions of the FBI, Turner would broadcast calls to murder various federal officials. When people would call in to approve of these messages, the FBI would arrest them. Turner told his story to the Bergen Record. He is a cocaine addict, and, during his time with the FBI, he became more, and, more, unreliable, until, in 2007, he was fired as an informant. After being dismissed, Turner provided false information about several people to the USMS, resulting in my own arrest, and, torture, by federal law enforcement officers. When the USMS discovered that they had been tricked, there was a falling out in which Turner threatened to murder three Seventh Circuit judges.

Because Turner was acting in a public capacity, was engaged in criminal wrongdoing in that capacity as part of his official duties, and, has broadcast this information through the press, he has no privacy interest in these records. Further, the FBI previously leaked some documents related to Turner's activities to the public via the internet in an effort to discredit Turner after he was discharged. The wrongdoing also warrants public

disclosure of Turner's file.

The FBI has not responded to this subject since November 2, 2016. The BATF ignored a November 27, 2016, request, and, the USMS ignored a December 15, 2016, request.

62) Brett Stevens

FBI no number assigned Exh E(a)(i)

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Brett Stevens is a false name used by a federal informant in Houston, Texas. After my conviction in 2013 in the WD Va, Stevens tendered a false affidavit to me in an effort to get an "in" on my legal defense team. Because Stevens is acting in an official capacity, he does not have a reasonable privacy interest in these records. Further, his misconduct while engaged in official duties also warrants release.

The FBI did not respond to a July 18, 2016, FOIA request on this subject. Similarly, the BATF did not respond to a November 27, 2016, request, and, the USMS did no respond to a December 15, 2016, request.

63) TFO / NYPD Detective Peter Zaleski

FBI no number assigned Exh E(a)(i)

Related Documents: Exh F(b)(iv)

Peter Zaleski is an FBI-JTTF TFO, and, NYPD Detective, who was assigned to the New York end of the North Korea operation. Zaleski has no privacy interest in work performed as part of his official duties, and, the general misconduct of the FBI-JTTF operation warrants release of these files.

The FBI did not respond to a December 1, 2016, request.

64) FBI SA James Majeski

FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

FBI SA James Majeski is an FBI SA assigned to the FBI-JTTF

operation. Majeski has no reasonable expectation of privacy in his official duties, and, the general misconduct of the FBI-JTTF warrants release of his file.

The FBI has not responded to this request since December 9, 2016, and, is in default. The BATF did not respond to a November 27, 2016, FOIA request, and, the USMS did not respond to a December 15, 2016, FOIA request.

65) TFO Robert Killian

FBI 1358523-000 Exh E(a)(iii); (j)(i)-(v)

OIP DOJ-AP-2017-000913

BATF no number assigned Exh C(a)

USMS no number assigned Exh D(a)

Related Documents: Exh F(a) p 74-78; (f)(i)-(ii)

Robert Killian is an Orange County, Florida, Sheriff's Deputy, and, FBI-JTTF TFO, who was assigned to the Aryan Nations, 1st SS Cavalry Brigade, Outlaw Bikers, and, American Front, operations. Using the name Michael "Doc" Schneider, Killian posed as a blind, homeless, Orthodox priest, and, co-hosted an anti-Judaic radio show. During the course of the investigation, Killian became concerned about the unethical, and, illegal, activities of his fellow agents, and, took some step to compromise the investigation, for which he was suspended from the Orange County Sheriff's Department, and, forced to retire.

Killian does not have a privacy interest in records of duties which he performed as a public official. Further, the misconduct that occurred, and, Killian's concerns about misconduct by others, warrant release of these records. The FBI has not responded to this subject since November 1, 2016, and, is in default. The BATF did not respond to a November 27, 2016, request, and, the USMS did not respond to a December 15, 2016, request.



FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

Michelle Krempa was an FBI SA in Florida assigned to the FBI JTTF operation. She has no privacy interest in records related to the performance of her official duties, and, release is warranted because of the misconduct of the FBI-JTTF operation.

The FBI has not responded to this subject since December 9, 2016, and, is in default. The BATF ignored a November 27, 2016, FOIA request, and, the USMS ignored a December 15, 2016, request.

67) FBI SA Thomas David Church

FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

Thomas David Church is an FBI SA in Virginia assigned to the FBI JTTF operation. He has no privacy interest in records related to the performance of his official duties, and, release is warranted because of the general misconduct of the FBI-JTTF operation.

The FBI has not responded to this subject since December 9, 2016, and, is in default. The BATF ignored a November 27, 2016, FOIA request, and, the USMS ignored a December 15, 2016, request.

68) TFO Debra Healy

FBI 1362495-000 Exh E(a)(v); (z)(i)-(ii)

Deborah Healy is an FBI-JTTF TFO, and, Seminole County, Florida, Sheriff, who presents herself as a computer expert, despite being absolutely incompetent in the field, as detailed in my habeas petitions. Healy has no privacy interest in records related to the performance of her official duties, and, because of the general misconduct of the FBI-JTTF operation, release is warranted.

The FBI has not responded to this subject since December 9, 2016, and, is in default. The BATF ignored a November 27, 2016, request, and, the USMS ignored a December 15, 2016, request.

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

I would like the Court to order the records specified in my various FOIA requests released to me. I also request the costs of this action.

VI. JURY DEMAND (*check one box below*)

The plaintiff ☐ does ☒ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 1-16-17  
(date)

  
\_\_\_\_\_  
Signature of Plaintiff

USP-Marion PO Box 1000  
Street Address

William A White  
Printed Name

Marion, IL 62959  
City, State, Zip

#13888-084  
Prisoner Register Number

\_\_\_\_\_  
Signature of Attorney (if any)



IN THE UNITED STATES DISTRICT COURT FOR THE

SOUTHERN DISTRICT OF ILLINOIS

East St Louis Division

William A White	[	
	[	
Plaintiff	[	
	[	
v	[	Case No: 16-cv-948
	[	
Department of Justice, et al	[	Judge Gilbert
	[	
Defendants	[	
	[	

INDEX OF EXHIBITS

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\* Exhibit A -- Documents relating to the 2013 FOIAs

- (a) 2013 US Marshals FOIA #2013USMS24506
  - (i) letter showing return of July 18, 2016 inquiry;
  - (ii) December 15, 2016 inquiry;
- (b) 2013 FBI FOIA #1224695-000
  - (i) April 16, 2016, FBI letter;
  - (ii) December 1, 2016, second appeal letter;

\* Exhibit B -- 2016 Bureau of Prisons FOIAs

- (a) BOP FOIA #2016-07558
    - (i) August 7, 2016 FOIA request;
    - (ii) August 15, 2016 BOP response;
    - (iii) September 26, 2016 BOP response;
    - (iv) October 3, 2016, appeal letter;
    - (v) December 30, 2016, second appeal letter;
  - (b) BOP FOIA #2017-01269
    - (i) November 20, 2016 FOIA request;
    - (ii) December 2, 2016 BOP response;
    - (iii) December 11, 2016 appeal letter;
    - (iv) December 21, 2016 appeal denial;
- cross-reference: Exh B(a)(v)

FOIA

(a) November 27, 2016 FOIA request;

\* Exhibit D -- 2016 US Marshals FOIA

(a) December 15, 2016 FOIA request;

\* EXHIBIT E-- (a) FOIA requests to the FBI:

(i) December 1, 2016 resubmission of July 18, 2016, request;

(ii) August 19, 2016, FOIA request;

(iii) August 24, 2016, FOIA request;

(iv) September 12, 2016, FOIA request;

(v) November 20, 2016, FOIA request;

(b) 1357551-000/001/002 "1st SS Cavalry Brigade"  
DOJ-AP-2017-000065

(i) September 8, 2016 response;

(ii) September 13, 2016, appeal letter;

(iii) October 6, 2016, appeal response;

(iv) October 25, 2016, appeal resolution;

(v) September 29, 2016, second response;

(vi) October 4, 2016, third response;

(vii) October 17, 2016, fee acceptance letter;

(viii) November 14, 2016, revocation;

(ix) November 25, 2016 appeal letter;

(x) December 16, 2016, appeal response;

(c) 1357558-000/001 "Soul Survivors Motorcycle Club"

DOJ-AP-2017-000067

(i) September 8, 2016 response;

- cross-reference Exh F(b)(ii) appeal letter;

(ii) October 6, 2016 appeal response;

(iii) October 25, 2016 appeal resolution;

(iv) September 30, 2016 second response;

(d) 1357563-000/001 "Outlaw Bikers (Osceola County, Florida)"

DOJ-AP-2017-000381

- (i) September 8, 2016 response;
- (ii) September 26, 2016 response;
- (iii) October 9, 2016 appeal letter;
- (iv) October 25, 2016 appeal response;
- (v) December 4, 2016, appeal denial;
- (vi) December 11, 2016 resubmission as new;
- (e) 1357582-000/001 "League of the South"

DOJ-AP-2016-005702 / DOJ-AP-2017-000383

- (i) September 9, 2016, response;
- (ii) September 16, 2016 appeal letter;
- (iii) October 5, 2016 appeal response;
- (iv) November 6, 2016 appeal resolution;
- (v) September 26, 2016 second response;
- (vi) October 11, 2016, second appeal letter;
- (vii) October 25, 2016 second appeal response;
- (viii) November 30, 2016 second appeal denial;
- (ix) December 11, 2016 resubmission as new;
- (f) 1357585-000/001/002 "Confederate Hammerskins"

DOJ-AP-2017-000066, DOJ-AP-2017-000850

- (i) September 8, 2016, response;
- cross-reference Exh E(b)(ii) September 13, 2016 appeal letter;
- (ii) October 6, 2016 appeal response;
- (iii) October 25, 2016 appeal resolution;
- (iv) September 27, 2016, second response;
- (v) October 3, 2016 partial release;

- (vii) November 3, 2016, second appeal letter
- (viii) November 22, 2016, second appeal response;
- (ix) November 30, 2016 third response;
- (x) December 12, 2016 partial release;
- (xi) December 30, 2016 appeal letter;
- (xii) January 4, 2017 third appeal letter;
- (g) 1357593-000/001/002 "National Socialist Movement"

DOJ-AP-2017-000064, DOJ-AP-2017-000851

- (i) September 8, 2016, response;  
cross-reference: Exh E(b)(ii)
- (ii) October 6, 2016, appeal response;
- (iii) October 25, 2016 appeal resolution;
- (iv) September 27, 2016, second response;
- (v) October 3, 2016, partial release;  
cross-reference Exh E(f)(vi)-(vii)
- (vi) November 22, 2016 second appeal response;
- (vii) November 30, 2016, third response;
- (viii) December 12, 2016 partial release;  
cross-reference Exh E(f)(xi)
- (ix) January 4, 2017 third appeal;
- (h) 1357439-000 "David Glett", "Gletty's Lover 'Joe' LNU", "Maitland, Florida FBI SA Kevin Farrington", "Orange County Sheriff's Deputy / TFO Kelly Boaz". "Tom Martin", "John Rock", "Brian Klose", "Deborah Plowman", "Harold Kinlaw", "Carlos Dubose"

- (i) September 9, 2016, response;
- (ii) September 13, 2016 appeal letter;
- (iii) September 26, 2016, second response;
- (iv) October 3, 2016 appeal letter;
- (v) November 1, 2016, appeal response;

- ion"
- (i) September 26, 2016, response;
  - (ii) October 17, 2016 fee letter;
  - (iii) November 1, 2016, acceptance letter;
- (j) 1358523-000 "Robert Killian", "Jason Hall"  
DOJ-AP-2017-000913
- (i) September 26, 2016, response;
  - (ii) October 6, 2016, appeal letter;
  - (iii) October 24, 2016, appeal denial;
  - (iv) November 1, 2016, second appeal letter;
  - (v) November 28, 2016, second appeal response;
- (k) 1359366-000 "Aryan Strike Force"  
DOJ-AP-2017-000520
- (i) October 12, 2016, response;
  - (ii) October 18, 2016, appeal letter;
  - (iii) November 2, 2016, appeal response;
  - (iv) December 12, 2016, denial letter;
- (l) 1359367-000 "Sonny Thomas"
- (i) October 11, 2016, response;
  - (ii) October 17, 2016, appeal letter;
  - (iii) November 7, 2016, appeal denial;
  - (iv) November 15, 2016, second appeal letter;
- (m) 1359374-000 "Golden State Skinheads"
- (i) October 14, 2016, response;
  - (ii) October 21, 2016, appeal letter;
- (n) 1359377-000 "Aryan Renaissance Society"
- (i) October 18, 2016, response;
  - (ii) October 27, 2016, appeal letter;

- (o) 1359387-000 "Matthew Heimbach", "Brooke Heimbach", "Matthew Parrott", "Rick Tyler", "Dr Matthew Raphael Johnson", "Steve Bowers" "Rebecca Barnette", "Pady Tarleton", "Scott Hess", "Tony Hovater", "Elisha Strom", "Christopher Drake", "Erica Hardwick-Hoesch" "Kristy Pryzbylla", "Ronald Cusack", "Peter James", "Harold Turner", "James Logsdon", "Rick Spring"

DOJ-AP-2017-000521

- (i) October 12, 2016, response;
- (ii) November 2, 2016 appeal response;

- (p) 135-9389-000 "Aryan Strike Force"

DOJ-AP-2017-000508

- (i) October 11, 2016 ~~response~~
  - (ii) October 17, 2016, appeal letter;
  - (iii) November 2, 2016 appeal response;
  - (iv) November 23, 2016, denial letter;
- (q) 13593990-000 "California Skinheads"
- (i) October 12, 2016, response letter;
  - (ii) October 12, 2016, second response letter;
  - (iii) October 18, 2016 acceptance letter;
  - (iv) January 3, 2017, request letter;
  - (v) January 7, 2017, deposit acceptance;
- (r) 1359397-000 "Blue Lives Matter of Texas"

- (i) October 18, 2016, response letter;
- cross-reference: Exh F(n)(ii) appeal letter;

- (s) 1359401-000 "Ohio Council of Concerned Citizens"

DOJ-AP\_2017-000517

- (i) October 12, 2016, response;



- (ii) November 2, 2016, appeal response;
- (iii) November 16, 2016, denial letter;
- (t) 1359403-000 "White Lives Matter"  
DOJ-AP-2017-000518
  - (i) October 12, 2016, response;
  - (ii) November 2, 2016, appeal response;
  - (iii) November 23, 2016 denial letter;
- (u) 1359407-000 "Traditionalist Workers Party"  
DOJ-AP-2017-000516
  - (i) October 11, 2016, response;
  - (ii) November 2, 2016 appeal response;
  - (iii) November 23, 2016, denial;
- (v) 1359414-000 "Aryan Nationalist Alliance"  
DOJ-AP-2017-000726
  - (i) October 14, 2016, response;
  - (ii) November 15, 2016, appeal response;
- (w) 1362474-000 "American National Socialist Workers' Party"
  - (i) December 9, 2016 response;
  - (ii) December 21, 2016, appeal letter;
- (x) 1362454-000 "Vinlander Social Club"
  - (i) December 9, 2016, response;
- (y) 1362476-000 "Seminole County Florida Sheriff's Office (FBI Contract Work And Cooperation with FBI-JTTF)"
  - (i) December 9, 2016, response;
- (z) 1362495-000 "Jeff Schoep", "Brian Holland", "Ron Wolf", "FBI SA James Majeski", "FBI SA Michelle Krempa", "FBI SA Thomas David Church", "Seminole County, Florida, Sheriff Debra Healy"

(i) December 9, 2016, response;

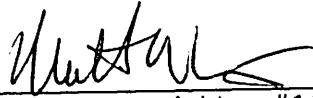
(ii) December 21, 2016, appeal letter;

- (a) Habeas petition (in part) WD Va 13-cr-013;
- (b) Relating to 480 Sherwood Dr:
  - (i) NK News article (WD Va 13-cr-013 Exh M(a))
  - (ii) "Beat Back The Lies Of NK News" (WD Va Exh M(b));
  - (iii) Intelligence Report on Sutter (WD Va 13-cr 013 Exh M(h));
  - (iv) November 21, 2016, Tonis letter;
- (c) Relating to the pre-2015 National Socialist Movement:
  - (i) David Gletty Undercover Nazi (WD Va 13-cr-013 Exh Q);
  - (ii) FBI internal reports;
- (d) Relating to the 1st SS Cavalary Brigade:
  - VNNForum post (WD Va 13-cr-013 Exh M(c))
- (e) Relating to Kelly Boaz:
  - (i) Plowman v Boaz (WD VA 13-cr-013 Exh V(e));
  - (ii) Orlando Sentinel Sep 1, 1991 (WD Va 13-cr-013 Exh M(n));
  - (iii) Orlando Sentinel Dec 13, 2000 (WD Va 13-cr-013 Exh M(e));
  - (iv) Orlando Sentinel Apr 17, 2015 (WD Va 13-cr-013 Exh M(p));
  - (v) Krasniqi v Boaz MD FL Case NO 00-cv-0259 (WD Va 13-cr-013 Exh V(d));
  - (vi) perjured arrest warrant Florida v Wyczlinski
- (f) Relating to Robert Killian:
  - (i) Intelligence Report (WD VA 13-cr-013 Exh M(d));
  - (ii) Killian disciplinary record;

- (g) Relating to Jason Hall:
  - (i) Orlando Sentinel Sep 2014 (WD VA 13-cr-013 Exh M(q));
  - (ii) WFTV Oct 5, 2012 (WD Va 13-cr-013 Exh M(r));
  - (iii) Orlando Sentinel Sep 11, 2014 (WD Va 13-cr-013 Exh M(s));
- (h) Relating to the ongoing operation:
  - (i) White Voice [Ohio];
  - (ii) The First Freedom [Heimbach];
  - (iii) The First Freedom [TN];
  - (iv) American Free Press [TN];
  - (v) White Lives Matter flier;
  - (vi) White Voice [Buffalo];
  - (vii) The First Freedom (California);
- (i) Harold Turner:
  - (i) transcript ED NY Case No 09-cr-650 (WD Va 13-cr-013 Exh O(c))
  - (ii) Bergen Record WD Va 13-cr-013 Exh M(g)
- (j) Brian Holland:
  - (i) article; (WD Va 13-cr-013 Exh R(a))
  - (ii) Coast to Coast AM; (WD Va 13-cr-013 Exh R(b))
- (k) Docket 243 in ED Va 07-cv-342
- (l) Intelligence Report on Vinlanders

- (a) American Free Press ad January 2/9, 2017;
- (b) The First Freedom masthead January 2017;
- (c) American Free Press article Jan 4, 2016;
- (d) The First Freedom article January 2016;
- (e) The Barnes Review article Mar/Apr 2016;
- (f) Northwest Observer article July 2016;
- (g) Citizen's Informer article Oct/Dec 2016;

Respectfully Submitted,



William A White #13888-084  
USP-Marion  
PO Box 1000  
Marion, IL 62959

CERTIFICATE OF SERVICE

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I hereby certify that this Index of Exhibit was mailed to the Clerk of the Court, 1st Class Postage Prepaid, for posting upon the Electronic Filing System this 16th day of January, 2017..



William A White